

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, an individual, JANE DOE 2,
and DOES 3-100,

Plaintiffs,

v.

THE CONGREGATION OF THE SACRED
HEARTS OF JESUS AND MARY,
DIOCESE OF FALL RIVER, a corporation sole,
SISTERS OF THE SACRED HEARTS OF
JESUS AND MARY, SISTERS OF CHARITY
OF MONTREAL, and BLACK AND WHITE
CORPORATIONS 1-10,

Defendants.

**DECLARATION OF
JANE DOE 1**

Case No.: 1:21-cv-06865

JANE DOE 1, being duly sworn, deposes and says:

1. I am one of the Plaintiffs in the above-entitled action, and I am over the age of 18 years old. I reside in New York City, NY 10023.
2. My Sister, Jane Doe 2, and I were born in Manhattan, New York and raised in Brooklyn, New York thereafter.
3. In or around 1964, my mother received promotional material from the Fall River Diocese and Sacred Hearts Academy while she was residing in New York.
4. At the time, we attended mass at St. John's Church on Utica Ave. in Brooklyn, New York.
5. For a short while before we were sent to Sacred Hearts Academy, we were sent to St. Matthew's School in Brooklyn, New York.

6. My parents were Cuban and had no formal education; promotional material was sent to our parish in Brooklyn, New York, and, thereafter, all of my cousins and I—including Jane Doe 2—were sent to boarding or military schools. It is my belief the Fall River Diocese and the nuns and priests under the Congregation of the Sacred Hearts sent promotional material to the parish we attended in Brooklyn, New York.

7. Consequently, I was enrolled in Sacred Hearts Academy in 1964. I was six years old, and my sister, Jane Doe 2, was five years old. My mother enrolled my sister and I at Sacred Hearts Academy because it held itself out as offering an excellent education for New Yorker residents.

8. In the Fall of 1964, Defendants' employees transacted with my mother in New York, agreeing to educate and care for my sister and I in exchange for monetary consideration.

9. I can recall my mother receiving, and thereafter signing, documents and invoices she received in the mail from the Fall River Diocese and the Congregation of the Sacred Hearts.

10. In the Fall of 1964, I recall Defendants' employees came to my family's home in Brooklyn, New York and took my sister, Jane Doe 2, and I into Massachusetts.

11. My sister, Jane Doe 2, and I were often taken on weekend trips, driven by Sacred Hearts Nuns and Grey Nuns, along with priests under the Congregation of the Sacred Hearts and the Fall River Diocese; during many of these trips, we were driven to locations in New York.

12. There are also locations in New York Sacred Hearts Nuns and Grey Nuns, along with priests under the Congregation of the Sacred Hearts and the Fall River Diocese drove us to, where we were sexually abused at, but I cannot recall.

13. For example, I remember the below photograph was taken at a school in New York we were driven to and sexually abused at one weekend, but I cannot recall the name of the school:



14. Each year thereafter, I also recall my mother receiving a report card and being made to sign such a report card at our home in Brooklyn, New York. By way of example:

TO PARENTS AND GUARDIANS

This report is an important message from teacher to parents. Please read it carefully. The marks are the teacher's account of your child's academic progress and school behavior.

If you have any doubts or questions about these marks, please arrange with the school principal for an interview, outside of school hours, with your child's teacher.

You are required to sign this report card. Your signature does not indicate that you are satisfied in every instance with the conduct and achievement of your child, but it does give us the assurance that you are familiar with the performance of your child while in our care.

Signature of Parent or Guardian

First Period Ana L. Williamson

Second Period Ana L. Williamson

Third Period Ana L. Williamson

Fourth Period _____

A check (✓) under Interview Requested means that the parent or guardian should arrange to call at the school personally, outside of school hours, to talk with the principal or the teacher regarding the best interest of the child.

	Interview Requested	Date of Interview
First Period		
Second Period		
Third Period		
Fourth Period		

Recommendation at the end of the year:

Assigned to Grade 9

DIOCESE OF FALL RIVER

REPORT OF PUPIL PROGRESS

Grades 3 - 8

Pupil Diana Williamson Grade 8

School Sacred Hearts Academy

City or Town Fairhaven, Mass.

School Year 1969 to 1970

Teacher Sr. Mariel Louise, ss. cc.

Principal Sr. Brigid, ss. cc.

"The proper and immediate end of Christian education is to co-operate with Divine Grace in forming true and perfect Christians; that is, to form Christ Himself in those regenerated by Baptism."

Pope Pius XI

15. Sacred Hearts Nuns and Grey Nuns, along with priests under the Congregation of the Sacred Hearts and the Fall River Diocese also drove us to parishes, seminaries, residences, and other locations in Maine, Vermont, Connecticut, and Rhode Island where we were violently sexually abused.

16. We were also violently sexually abused by nuns and priests in Massachusetts—at Sacred Hearts Academy, St. Joseph's Orphanage, and other locations in Massachusetts.

17. Before and after many of the incidents of sexual abuse, I can recall the Sacred Hearts Nuns telling us we were taken because our mother had not paid tuition money that month, or our tuition payments were late; I believe the Sacred Hearts Nuns and the Grey Nuns received

money that they used to fund their schools, orphanages, and other ventures from the priests and other men that violently sexually abused us.

18. I was also driven to violently sexually abused by Fall River Priests, Sacred Hearts Sisters and Priests, Grey Nuns of Quebec, Grey Nuns of Montreal, and Oblates in Massachusetts.

19. I was violently sexually abused by Fall River Priests, Sacred Hearts Sisters and Priests, Grey Nuns of Quebec, Grey Nuns of Montreal, and Oblates in Maine.

20. My sexual abusers included Father Porter, Father William Carroll, Frederick Fury, Raymond Mahoney, Father Arthur Craig, Father Alphonse Breault, "Ralph," Sister Mary Felix, and Sister Ursula.

21. My sister, Jane Doe 2, and I were regularly taken by Sacred Heart Sisters, Grey Nuns of Quebec, and Grey Nuns of Montreal to The Missionary Oblates Seminary and Mission Houses in Essex, New York and Newburg, New York. Father Arthur Craig abused me at the Essex, New York location at least ten times.

22. My sister and I were regularly taken by Sacred Heart Sisters, Grey Nuns of Quebec, and Grey Nuns of Montreal to The Missionary Oblates Seminary and Mission House in Bucksport, Maine where we were abused five to ten times by Father Alphonse Breault.

23. I estimate that Jane Doe 2 and I were taken to 30 to 40 different locations to be sexually abused by adults. Many of these locations were private residences and schools in New York.

24. Diocese of Fall River priests, Congregation of the Sacred Hearts nuns and priests, the Grey Nuns, and Oblate priests all took part in driving my sister and I to and home to Brooklyn, New York for holidays and breaks.

25. I remember the Congregation of the Sacred Hearts nuns and priests, the Grey Nuns, and the Oblate priests all seemed to share a connection and often congregate at religious events—including celebrations, performances, and funerals—because most of them were French or French Canadian.

26. When my sister, Jane Doe 2, and I were sexually abused in the 1960s, the Grey Nuns involved in the incidents of sexual abuse only identified as “Grey Nuns,” and there were a number of Grey Nuns who drove us to and from the locations we were sexually abused at.

27. Had Fall River Priests, Congregation of Sacred Hearts nuns and priests, the Grey Nuns and the Oblate priests not been able to transfer my sister and I to and from New York, we would not have been enrolled at Sacred Hearts Academy. I know this for a fact because my family did not have a car, and my mother did not even have a driver’s license.

28. I can specifically recall the year that I fell ill, Congregation of Sacred Hearts nuns along with members of the Grey Nuns drove me home to Brooklyn, New York.

29. I can specifically recall when I was sent to Maine for the summer to be “tutored” by Ralph, during which time I was held captive in Ralph’s attic and violently sexually assaulted, I was driven to Maine by Congregation of Sacred Hearts nuns along with members of the Grey Nuns.

30. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and I sign under the pains and penalties of perjury in the State of New York. Executed on September 28, 2022.

/s/ Jane Doe 1